



THOMAS AMBROSIO

ATTORNEY AT LAW

Member of NJ & NY Bars

May 28, 2020

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Application granted. The status conference is adjourned to August 7, 2020 at 10:00 a.m. The trial currently scheduled for July 13, 2020 is adjourned sine die. Time is excluded to August 7, 2020, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(a).

RE: USA vs Fernando Keyes SO ORDERED.
Indictment 20-cr-95

Ronnie Abrams, U.S.D.J.
May 28, 2020

Dear Judge Abrams:

The above referenced matter is scheduled for a status conference before Your Honor on June 8, 2020 and for trial on July 13, 2020.

With the consent of Alexandra Rothman, AUSA I am respectfully requesting that the status conference and the trial date both be extended 60 days.

My ability to adequately review the discovery with Mr. Keyes and to adequately consult with him about his defenses and his plea negotiations have been severely hampered by the COVID-19 pandemic.

In closing, I hope this letter finds Your Honor and your staff well.

Respectfully yours,

/s/Thomas Ambrosio
Thomas Ambrosio

cc: Alexandra Rothman (via ECF)
Fernando Keyes (via regular mail)